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Exhibit N

Case: 4:22-cv-00519-HEA Doc. #: 63-15 Filed: 05/01/24 Page: 2 of 7 PageID #: 969

IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

TAIWAN DICKERSON, KIM KING-MACON, and TIFFANY RUSSELL

PLAINTIFFS

VS.

No. 4:22-cv-519-HEA

CENTENE MANAGEMENT COMPANY, LLC, and CENTENE CORPORATION

DEFENDANTS

PLAINTIFFS' SUPPLEMENTAL DISCLOSURES
PURSUANT TO RULE 26(a)(1)

Plaintiffs Taiwan Dickerson, Kim King-Macon and Tiffany Russell, by and through their attorney Josh Sanford of Sanford Law Firm, PLLC, hereby submit the following Supplemental Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1):

(3) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34, the documents or other evidentiary material, not privileged or protected from disclosure on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

Computations of unpaid wages are attached. The categories of damages are as follows: Unpaid back wages, including overtime wages; pre-judgment interest; post-judgment interest; liquidated damages; court costs; and attorney's fees. Please see enclosed.

Because Defendants only recently provided responses to Plaintiffs' written discovery, Plaintiffs have made certain assumptions regarding pay rates and total hours Page 1 of 3

Taiwan Dickerson, et al. v. Centene Management Company, LLC, et al. U.S.D.C. (E.D. Mo.) No. 4:22-cv-519-HEA Plaintiffs' Supplemental Disclosures Pursuant to Rule 26(a)(1)

worked. Once Plaintiffs have had adequate time to review the records provided by Defendants, Plaintiffs reserve the right to send a revised damages calculation.

Respectfully submitted,

TAIWAN DICKERSON and KIM KING-MACON and TIFFANY RUSSELL, PLAINTIFFS

SANFORD LAW FIRM, PLLC Kirkpatrick Plaza 10800 Financial Centre Pkwy, Suite 510 Little Rock, Arkansas 72211 Telephone: (800) 615-4946 Facsimile: (888) 787-2040

/s/ Josh Sanford
Josh Sanford
Ark. Bar No. 2001037
josh@sanfordlawfirm.com

CERTIFICATE OF SERVICE

I, Josh Sanford, do hereby certify that a true and correct copy of the foregoing was served via email on April 12, 2024, to the attorneys listed below:

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Eva C. Madison, Esq.

Admitted Pro Hac Vice

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emadison@littler.com

/s/ Josh Sanford

Josh Sanford

Taiwan Dickerson

Taiwan Dicke	erso	n			1					1
						(Gap/OT	Dar	nages with	
WeekEnd	R	leg Rate	0	T Rate	OTC Hours	D	amages	Li	quidation	
5/13/19	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
5/27/19	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
6/10/19	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
6/24/19	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
7/8/19	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
7/22/19	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
8/5/19	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
8/19/19	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
9/2/19	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
9/16/19	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
9/30/19	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
10/14/19	\$		\$			\$	931.37	\$		
		20.697		31.05	30.00			÷	1,862.73	
10/28/19	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
11/11/19	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
11/25/19	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
12/9/19	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
12/23/19	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
1/6/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
1/20/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
2/3/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
2/17/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
3/2/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
3/16/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
3/30/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
4/13/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
4/27/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
5/11/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
5/25/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
6/8/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
6/22/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
7/6/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
7/20/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
8/3/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
8/17/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
8/31/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
9/14/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
9/28/20		20.697	\$	31.05	30.00		931.37	\$	1,862.73	
10/12/20		20.697	\$	31.05	30.00		931.37	\$	1,862.73	
			- : -			_		<u> </u>		
10/26/20 11/9/20	-	20.697	\$	31.05	30.00	_	931.37	\$	1,862.73	
	-	20.697	\$	31.05	30.00		931.37	\$	1,862.73	
11/23/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
12/7/20	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
12/21/20	\$	20.697	\$	31.05	30.00	_	931.37	\$	1,862.73	
1/4/21	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
1/18/21	\$	20.697	\$	31.05	30.00	-	931.37	\$	1,862.73	
2/1/21	\$	20.697	\$	31.05	30.00		931.37	\$	1,862.73	
2/15/21	\$	20.697	\$	31.05	30.00		931.37	\$	1,862.73	
3/1/21	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
3/15/21	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
3/29/21	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
4/12/21	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
4/26/21	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
5/10/21	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
5/24/21	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
6/7/21	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
6/21/21	\$	20.697	\$	31.05	30.00	\$	931.37	\$	1,862.73	
								\$1		Total

Kim King-Macon

Kiiii Kiiig-Ma										
						(ap/OT	Dam	nages with	
WeekEnd	Re	eg Rate	0	T Rate	OTC Hours	D	amages	Liq	uidation	
5/13/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
5/27/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
6/10/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
6/24/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
7/8/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
7/22/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
8/5/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
8/19/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
9/2/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
9/16/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
9/30/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
10/14/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
10/28/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
11/11/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
11/25/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
12/9/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
12/23/19	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
1/6/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
1/20/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
2/3/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
2/17/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
3/2/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
3/16/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
3/30/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
4/13/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
4/27/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
5/11/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
5/25/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
6/8/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
6/22/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
7/6/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
7/20/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
8/3/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
8/17/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
8/31/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
9/14/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
9/28/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
10/12/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
10/26/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
11/9/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
11/23/20	\$	19.21	\$	28.82	8.00	\$	230.52	\$	461.04	
								\$1	8,902.64	Total

Tiffany Russell

Week End	R	eg Rate	0	T Rate	OTC Hours	Gap/OT amages	Damages with Liquidation
7/29/19		20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
8/12/19	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
8/26/19	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
9/9/19	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
9/23/19	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
10/7/19	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
10/21/19	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
11/4/19	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
11/18/19	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
12/2/19	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
12/16/19	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
12/30/19	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
1/13/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
1/27/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
2/10/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
2/24/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
3/9/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
3/23/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
4/6/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
4/20/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
5/4/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
5/18/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
6/1/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
6/15/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
6/29/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
7/13/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
7/27/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
8/10/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
8/24/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
9/7/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
9/21/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
10/5/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
10/19/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
11/2/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
11/16/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
11/30/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
12/14/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
12/28/20	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
1/11/21	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
1/25/21	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
2/8/21	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
2/22/21	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
3/8/21	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
3/22/21	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
4/5/21	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
4/19/21	\$	20.79	\$	31.19	20.00	\$ 623.78	\$ 1,247.56
							\$57,387.85 Total